

REMARKS

In the First Office Action mailed May 9, 2005, claims 1-30 are rejected under 35 USC 102(e) as being anticipated by Kittross et al. (U.S. Patent 6,681,351, "Kittross").

In response to the rejection, Applicants respectfully traverse the rejection and submit that the claims as pending clearly distinguish over the cited reference, and respectfully request reconsideration for the reasons set forth below. There are 3 independent system claims and three independent method claims pending in the application.

Kittross is directed to a system for programming automatic test equipment to overcome problems of conventional code-based and template-based approaches to creating a test program. In particular, the system of Kittross provides a test procedure from multiple test elements. Each test element defines instructions and programmable input variables for a particular test operation. That is, each test element preferably embodies the basic functionality of one of the ATE system's instruments or capabilities. The test procedure defines a device testing task and can operate as a test program, or be combined with other test procedures to form a larger test program. Accordingly, there is no need to write a test program code from scratch as in the conventional code-based approach. Furthermore, providing a test procedure from test elements generally provides greater flexibility than modifying prewritten test program templates. (Col. 3, line 55 – col. 4, line 6). Accordingly, Kittross overcomes the problems of conventional code-based approaches (which are time consuming) and template-based approaches (which are generally inflexible) by generating a test program using smaller units (i.e. test elements). However, Kittross fails to disclose or suggest Applicants' client-server verification system and method, as will be described for each claim below.

Claim 1

Independent claim 1 is directed to a client-server verification system comprising a client device and a server. It is suggested in the Office Action that the client device is disclosed by Kittross as a "user computer" storing test programs (i.e. test program 38/test procedure 40), while the server is disclosed by the processor 26. However, the

test program 38/test procedure 40 are part of a memory 22, and not a user computer separate from the processor 26 as suggested in the Office Action. Moreover, Kittross expressly states that memory 22 and processor 24 may form portions of either (i) a general purpose computer, or (ii) a specialized ATE device. However, there is no teaching or suggestion in Kittross of a client device and a server in a client-server semiconductor verification system. Accordingly, Applicants respectfully submit that Kittross fails to disclose a client-server verification system as claimed by Applicants.

Further, the client device of the system of claim 1 stores a test job having test vectors and “configuration data for programmable logic,” where the system under test has “programmable logic which is configured using said configuration data.” It is suggested that the “instructions for configuring DUTs” are disclosed by Kittross in col. 4, lines 32-46. However, the disclosure in col. 4, lines 32-46 relates to mixed signal test procedures which direct the device under test to perform predetermined operations. The test element database of Kittross includes (i) analog signal test elements which define instructions that direct the processor to perform analog signal test operations, (ii) digital signal test elements which define instructions that direct the processor to perform digital signal test operations, and (iii) other test elements which define instructions for configuring the DUT “to receive and transmit stimulus and response signals.” That is, test signal does not include configuration data for programmable logic, but rather instructions for configuring the DUT to perform an operation. In the case of other test elements, an input/output operation of receiving and transmitting stimulus and response signals is performed. Applicants respectfully submit that instructions to perform an operation do not comprise configuration data for programmable logic as claimed. Applicants submit that independent claim 1 as pending, and its dependent claims 2-5, clearly distinguish over Kittross, and respectfully request reconsideration of the claims.

Claim 6

Independent claim 6 is also directed to a client-server verification system comprising a client device and a server. Because claim 6 also comprises a client device and a server, and configuration data for programmable logic as claimed in

claim 1, Applicants believe that claim 6 is also allowable for the same reasons set forth above with respect to claim 1. However, Applicants further note that claim 6 recites "a plurality of client devices." Kittross fails to disclose or suggest a plurality of client devices in a client-server verification system for the same reason that it fails to disclose or suggest single client device in a client-server verification system as set forth above. While the contents of the memory may be received from a variety of memory sources including secondary memory or other storage media, Applicants note that memory 22 may form portions of either (i) a single general purpose computer or (ii) ATE device. (Col. 13, lines 60-63). There is simply no teaching or suggestion of a client-server verification system having a plurality of client devices. Applicants submit that independent claim 6 as pending, and its dependent claims 7-10, clearly distinguish over Kittross, and respectfully request reconsideration of the claims.

Claim 11

Independent claim 11 is also directed to a client-server verification system having a plurality of client devices, and further comprises a job distribution server and a server coupled to (i) the plurality of client devices by way of the job distribution server and (ii) the system under test. Col. 12, lines 25-39 are cited for disclosing a job distribution server. However, Applicants note that steps 124 and 126 of Fig. 8 which are described in col. 12, lines 25-39 relate to a test program interpreter 64 and a procedure manager 66 of a test application 34 of memory 22. The job distribution server could not also be the client device (i.e. memory 22 as suggested in the Office Action). In addition to failing to disclose or suggest a plurality of client devices in a client-server verification system, Applicants respectfully submit that there is clearly no teaching or suggestion of a job distribution server and a separate server coupled to (i) the plurality of client devices by way of the job distribution server and (ii) the system under test. Applicants submit that independent claim 11 as pending, and its dependent claims 12-15, also clearly distinguish over Kittross, and respectfully request reconsideration of the claims.

Claim 16

Independent claim 16 is also directed to a method of verifying a semiconductor design by way of a server. Applicants claim a step of storing a test job having test vectors and configuration data for programmable logic. Applicants further claim a step of configuring the system under test having programmable logic. For the same reasons set forth above, Applicants respectfully submit that Kittross fails to disclose or suggest storing configuration data for programmable logic, or configuring programmable logic. Applicants submit that independent claim 16 as pending, and its dependent claims 17-20, also clearly distinguish over Kittross, and respectfully request reconsideration of the claims.

Claim 21

Independent claim 21 is also directed to a method of verifying a semiconductor design by way of a server. Claim 21 includes a step of “coupling a plurality of client devices to a test server, each said client device storing a test job for testing the design of a logic circuit, said test job having test vectors and configuration data for programmable logic.” Further, Applicants claim a step of reconfiguring the system under test having programmable logic. For the same reasons set forth above, Applicants respectfully submit that Kittross fails to disclose or suggest configuration data for programmable logic or configuring a system under test having programmable logic. Applicants submit that independent claim 21 as pending, and its dependent claims 22-25, also clearly distinguish over Kittross, and respectfully request reconsideration of the claims.

Claim 26

Finally, independent claim 26 is also directed to a method of verifying a semiconductor design by way of a server. In addition to failing to disclose steps of (i) coupling a plurality of client devices to a job distribution server; and (ii) reconfiguring a system under test by way of the test server, Applicants respectfully submit that Kittross fails to disclose the step of “coupling said job distribution server to a plurality of servers, each said server coupling predetermined test vectors to a system under test

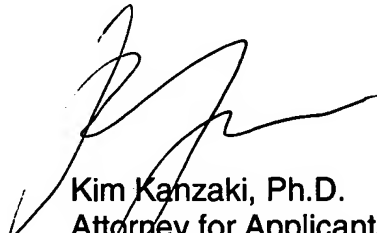
of a plurality of systems under test." That is, Kittross clearly fails to disclose a job distribution server and a separate server as claimed. Applicants submit that independent claim 26 as pending, and its dependent claims 27-30, also clearly distinguish over Kittross, and respectfully request reconsideration of the claims.

CONCLUSION

All claims should be now be in condition for allowance and a Notice of Allowance is respectfully requested.

If there are any questions, the Applicants' attorney can be reached at Tel: 408-879-6149 (Pacific Standard Time).

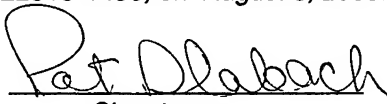
Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450, on August 3, 2005.

Pat Slaback
Name



Signature